

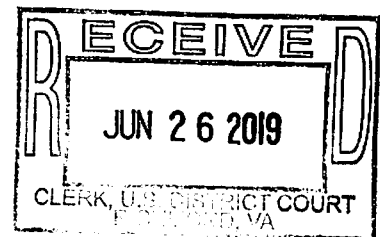
**United States District Court
for the
Eastern District of Virginia (Richmond Division)**

**Dean Fougere
154 Lake Drive
Plymouth, MA 02360
508-524-7228**

**Jason Goodman, CEO
Multimedia Systems Designs, Inc.
252 7th Avenue, APT #6-S
New York, NY 10001-7334**

Truth@crowdsourcethetruth.org

**Clerk of the Court, Suite 200
United States District Court
Eastern District of Virginia
701 E Broad St.
Richmond, VA 23219**



**SUBJECT: Robert David Steele, et al., Plaintiff vs. Jason Goodman, et al., Defendant Case
No.: 3:17-cv-00601-MHL**

REF: Case 3:17-cv-00601-MHL Document 125

REF: Case 3:17-cv-00601-MHL Document 121-1

SUBJECT: Harassment and Posting of Incorrect Personal Information

Ladies and Gentlemen,

In document ECF no. 125, posted to the court by defendant Jason Goodman. Jason requests discovery from me, and I am saying no. Jason has no evidence of a “conspiracy” that I am involved in, nor does he have any evidence to support such claims as is noted in document ECF no. 121-1. I have already stated my position in a court affidavit, and that is all I am willing to provide to the court at this time.

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Furthermore, I consider this filing to the court by Jason Goodman to be continued harassment of my place of business. In document ECF no. 125 he posts my workplace number 508-329-2046 and my place of residence. I feel this was done for no other reason to cause me harm by posting a number that is not mine, it belongs to my employer, and by posting that and my home address that makes both a target for the supporters of his, of which he has over 75K subscribers just on YouTube. I would like my address and especially my employer's phone number to be removed or redacted from the court document. I also feel this is some form of witness intimidation.

I have no evidence in my possession that would appear to be relevant to Jason Goodman. It is my opinion that Jason Goodman is trying to complicate this lawsuit by dragging in my supposed evidence for which he needs discovery. I strongly believe that Jason Goodman cannot describe what evidence I possess that he believes would be relevant.

In the "Rule 11 sanctions" document ECF no. 121-1 it is proposed that Jason Goodman be charged with a \$25,000 dollar fine for continuing to publish erroneous content about the witnesses in this case. If this proposed order is upheld, then I seek \$25,000 in compensation for Jason Goodman posting my name for discovery and putting my place of employment's number into the court which is further undue harassment by Jason Goodman that is intended to cause me financial harm by misusing the court.

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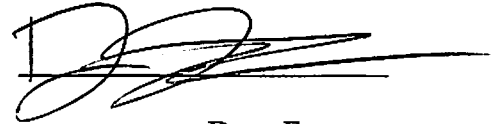
I SWEAR OR AFFIRM THAT THE ABOVE AND FOREGOING
REPRESENTATIONS ARE TRUE AND CORRECT TO THE BEST OF MY
INFORMATION, KNOWLEDGE, AND BELIEF.

I hereby certify (under the penalties of perjury) that the foregoing pleading has been deposited
with the U.S. Post Office with First Class mail to the following parties:

Copies forwarded to the following:

Susan A.Holmes,
Aka Lutzke
2608 Leisure Drive
Apt. B
Ft. Collins, CO 80525

WITNESS my signature, this the 24th day of June, 2019.

A handwritten signature in black ink, appearing to read 'D. Fougere', with a horizontal line drawn through the middle of the signature.

Dean Fougere